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Case 1:08-cr-00364

Document 1-2

Filed 04/22/2008

Page 1 of 3

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APRIL 22, 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MAGISTRATE JUDGE
GERALDINE SOAT BROWN

JUDGE LEINENWEBER

UNITED STATES OF AMERICA

v.

JERMEL POPE, also known as "LOK," and
MARY MICHELLE JEFFERSON

)
)
) No. 08CR 334

) Violation: Title 18, United States Code,
) Section 2421
)
)

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COUNT ONE

The SPECIAL FEBRUARY 2008-1 GRAND JURY charges:

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

1. At times material:

a. JERMEL POPE, also known as "LOK," and MARY MICHELLE

JEFFERSON, resided at 2044 Fox Pointe Circle, Apartment 107, Aurora, Illinois.

b. Victim A was a female under the age of eighteen who lived in Wisconsin.

2. On or about January 27, 2008, in the Northern District of Illinois and elsewhere,

JERMEL POPE, also known as "LOK," and
MARY MICHELLE JEFFERSON,

defendants herein, knowingly transported an individual, "Victim A," in interstate commerce, from the State of Wisconsin to the State of Illinois, with the intent that such individual engage in prostitution;

In violation of Title 18, United States Code, Section 2421.

FORFEITURE ALLEGATIONS

The SPECIAL FEBRUARY 2008-1 GRAND JURY further alleges:

1. The allegations of this indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 2428.
2. As a result of their violations of Title 18, United States Code, Section 2421 and 2423(a),

JERMEL POPE, also known as "LOK," and
MARY MICHELLE JEFFERSON,

defendants herein, have subjected to forfeiture to the United States, pursuant to Title 18, United States Code, Section 2428(a), the following property and interests:

- a. Any and all real and personal property used or intended to be used to commit or to promote the commission of the violations set forth in this indictment;
and
 - b. Any and all real and personal property constituting, derived or traceable to gross profits and other proceeds obtained from the violations set forth in this indictment.
3. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 2428(a), include, but are not limited to, the following:
- a. 2001 Hyundai Sante Fe, bearing Illinois license plate 6887150, assigned Vehicle Identification Number KM8SC83D61U017355;
 - b. Compaq Presario laptop computer, bearing serial number CNF5452KFW;
 - c. Apple IMac Model 5521 computer, bearing serial number RN0282GVJVA;
- and

d. Hewlett Packard Pavilion 4400 computer, bearing serial number US90541911.

4. If any of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 2428(a), as a result of any act or omission of defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value, or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property under the provisions of Title 18, United States Code, Section 2428, to seek forfeiture of any other property of said defendants up to the value of said property listed above as being subject to forfeiture.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY